

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE PORK ANTITRUST
LITIGATION

Case No. 0:18-cv-01776 (JRT-JFD)

This Document Relates to:

All Consumer Indirect Purchaser Plaintiff
Actions

**DECLARATION OF SHANA E.
SCARLETT IN FURTHER
SUPPORT OF CONSUMER
INDIRECT PURCHASER
PLAINTIFFS' MOTION FOR AN
AWARD OF ATTORNEYS' FEES
AND EXPENSES**

I, Shana E. Scarlett, state under oath, as follows:

1. I am a partner at Hagens Berman Sobol Shapiro LLP (Hagens Berman). I am admitted to this Court *pro hac vice*, and I am one of the Co-Lead Counsel (along with Gustafson Gluek PLLC) for the Consumer Indirect Purchaser Plaintiffs appointed by the Court to represent the Consumer Indirect Class in this litigation. I submit this declaration in support of the Consumer IPPs' Motion for an Award of Attorney's Fees and Expenses. I have full knowledge of the matters stated herein and would testify to these facts if called upon.

2. Hagens Berman's lodestar is calculated using two sets of fees.

a) The first set of fees is for work performed from the inception of this case through June 30, 2021. Historic 2021 hourly rates are applied to these work hours.

b) The second set of fees is for work performed from July 1, 2021, through December 31, 2022. Current hourly rates for 2023 are applied to these work hours.

3. The regular hourly rates charged by Hagens Berman for the timekeepers involved in this litigation, including both 2021 rates and current rates, are boxed in red in the chart below:

SUMMARY OF TIME AND LODESTAR FOR HAGENS BERMAN SOBOL SHAPIRO LLP
REPORTED HOURS AND LODESTAR – INCEPTION THROUGH DECEMBER 31, 2022

Name	Inception through June 30, 2021			July 1, 2021, through December 31, 2022			Inception through June 30, 2021	
	2021 Hourly Rate	Hours Worked This Period	2021 Lodestar	Current Hourly Rate	Hours Worked This Period	Lodestar This Period	Total Hours Worked on Case	Total Lodestar
Steve Berman (P)	\$1,125.00	97.40	\$109,575.00	\$1,285.00	16.50	\$21,202.50	113.90	\$130,777.50
Shana Scarlett (P)	\$800.00	809.90	\$647,920.00	\$935.00	884.60	\$827,101.00	1694.50	\$1,475,021.00
Elaine Byszewski (P)	\$700.00	68.00	\$47,600.00	\$850.00	1098.30	\$933,555.00	1166.30	\$981,155.00
Andrew Volk (P)	\$800.00	16.10	\$12,880.00	\$935.00	369.00	\$345,015.00	385.10	\$357,895.00
Elizabeth Fegan (P)	\$750.00	3.00	\$2,250.00				3.00	\$2,250.00
Chris O'Hara (P)	\$675.00	52.50	\$35,437.50	\$750.00	77.50	\$58,125.00	130.00	\$93,562.50
Dan Kurowski (P)	\$650.00	1.20	\$780.00				1.20	\$780.00
Ben Harrington (P)	\$700.00	114.90	\$80,430.00				114.90	\$80,430.00
Rio Pierce (P)	\$700.00	752.00	\$526,400.00	\$800.00	259.30	\$207,440.00	1011.30	\$733,840.00
Jessica Thompson (A)	\$425.00	47.50	\$20,187.50	\$650.00	499.90	\$324,935.00	547.40	\$345,122.50
Joey Kingerski (A)				\$350.00	57.00	\$19,950.00	57.00	\$19,950.00
Abigail Pershing (A)				\$350.00	685.00	\$239,750.00	685.00	\$239,750.00
Allison Berk (A)				\$450.00	156.70	\$70,515.00	156.70	\$70,515.00
Breanna Van Engelen (A)	\$500.00	529.60	\$264,800.00	\$650.00	1379.00	\$896,350.00	1908.60	\$1,161,150.00
Hannah Song (A)				\$475.00	218.40	\$103,740.00	218.40	\$103,740.00
Nia Reese (A)				\$350.00	152.80	\$53,480.00	152.80	\$53,480.00
Stephanie Verdoia (A)				\$350.00	34.90	\$12,215.00	34.90	\$12,215.00
Helen Hsu (SA)	\$350.00	249.10	\$87,185.00	\$400.00	1872.30	\$748,920.00	2121.40	\$836,105.00
Jongguk Choi (SA)	\$350.00	297.90	\$104,265.00	\$400.00	1904.90	\$761,960.00	2202.80	\$866,225.00
Jay Mitchell (SA)	\$350.00	128.40	\$44,940.00				128.40	\$44,940.00
Laura Pedersen (SA)				\$400.00	94.30	\$37,720.00	94.30	\$37,720.00
Patrick Ryan (SA)	\$350.00	485.00	\$169,750.00				485.00	\$169,750.00
Matthew Arnold (C)				\$375.00	1338.10	\$501,787.50	1338.10	\$501,787.50
Robert Willard (C)				\$375.00	668.00	\$250,500.00	668.00	\$250,500.00
Erica Lee (C)				\$375.00	1649.20	\$618,450.00	1649.20	\$618,450.00
Tiffani Fox (C)				\$375.00	47.00	\$17,625.00	47.00	\$17,625.00
Brian Miller (PL)	\$350.00	249.40	\$87,290.00	\$400.00	223.80	\$89,520.00	473.20	\$176,810.00
Dianne Grant (PL)				\$375.00	140.30	\$52,612.50	140.30	\$52,612.50
Jennifer Conte (PL)	\$300.00	41.30	\$12,390.00	\$375.00	536.40	\$201,150.00	577.70	\$213,540.00
Lisa Lin (PL)	\$265.00	0.50	\$132.50				0.50	\$132.50
Jeaneth Decena (PL)	\$350.00	542.40	\$189,840.00				542.40	\$189,840.00
Megan Meyers (PL)	\$250.00	0.40	\$100.00	\$325.00	35.10	\$11,407.50	35.50	\$11,507.50
Adrian Garcia (PL)	\$175.00	4.00	\$700.00				4.00	\$700.00
Noreen Andersen (PL)	\$175.00	32.80	\$5,740.00				32.80	\$5,740.00
Radha Kerzan (PL)				\$325.00	37.50	\$12,187.50	37.50	\$12,187.50
Shelby Taylor (PL)				\$325.00	32.40	\$10,530.00	32.40	\$10,530.00
Bill Stevens (PL)				\$375.00	202.10	\$75,787.50	202.10	\$75,787.50
Chan Lovell (PA)	\$175.00	3.20	\$560.00	\$225.00	410.20	\$92,295.00	413.40	\$92,855.00
Chad Schaaf (LA)	\$175.00	3.30	\$577.50				3.30	\$577.50
Amy Elder (T)	\$175.00	331.00	\$57,925.00	\$225.00	514.90	\$115,852.50	845.90	\$173,777.50
Matt Isaacs (I)	\$200.00	57.50	\$11,500.00				57.50	\$11,500.00
TOTALS:		4918.30	\$ 2,521,155.00		15595.40	\$ 7,711,678.50	20513.70	\$ 10,232,833.50

Partner/Shareholder (P) Associate (A) Staff Attorney (SA) Contract Attorney (C) Paralegal (PL) Paralegal Assistant (PA) Investigator (I) Translator (T) Legal Assistant (LA)

I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

DATED: April 6, 2023

/s/ Shana E. Scarlett
SHANA E. SCARLETT